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December 29, 1997

Elijah Mondy, Jr.  
4200 W. 177th St.  
Country Club Hills, IL 60478

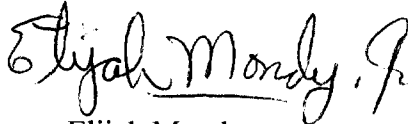
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Federal Communications Commission  
Office of the Secretary  
1919 M. Street Room 222 N.W.  
Washington, D.C. 20554

To Whom It May Concern:

Enclosed are the original and four copies of my response to a reply from Pollack Broadcasting on my comments regarding Notice of Proposed Rulemaking MM Docket No. 97-215 and RM-9168 to reallocate Channel 234A from Wilson, Arkansas to Turrell, Arkansas and modify the authorization for station KAFW (FM). Also enclosed are envelopes for chairman Kennard and Mr. John Karousos. Please forward them. If there are any questions, please call me at 708-957-5210. Thank you.

Sincerely,



Elijah Mondy,

OSY

In the Matter of

Amendment of Section 73.202(b)  
Table of Allotments,  
FM Broadcast Stations.  
(Wilson and Turrell, Arkansas)

MM Docket No. 97-215)  
RM-9168

RESPONSE TO POLLACK BROADCASTING'S REPLY

Elijah Mondy, Jr.  
Mondy-Burke Broadcasting  
4200 W. 177th Street  
Country Club Hills, IL 60478  
December 29, 1997

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This is my response to Pollack Broadcasting and Mr. Wood's reply which I received on December 19, 1997. It is important that this response be entered into the records along with my other documents sent earlier regarding this matter.

"Senseless", "procedurally defective", "meritless", "irrational", "confused", "murmurings", these are some of the unfortunate terms that Mr. Wood used in describing me and my state of mind. I did not know that he was into psychiatry. The use of these terms is a weak attempt to confuse, evade and actually avoid the primary issues that I have raised.

When a construction permit is granted the Commission allows 18 months to build the station. Pollack broadcasting has dragged this thing out for over seven years.... that's three times the 18 months and one half... that's incredible! seven years.

After a process characterized by delays, dismissals, deletion, and ignoring the Commission's insistence for a certification to immediately build the FM allotment at Wilson and a warning that what they were attempting to do in this rule making strategy probably would not fly, here we are seven years later and the FM station at Wilson still has not been built, and now they have the audacity to want to dump Wilson as the allotted city and move the allotment to Turrell which is in closer proximity to Memphis, practically a suburb, which would amount to rewarding them for not abiding by the rules of the Commission and ignoring the Commission's request. What is the point of the Commission having an 18 month rule if Pollack broadcasting can disregard it and procrastinate and do what they have done....stretch this process out for seven years.

I do understand that there are circumstances when an extension is allowable but in this case of Pollack, I think it unreasonable. I am amazed at how Mr. Wood can now evoke FCC procedure and rules to counter me when Pollack Broadcasting has not abided by a simple rule and order of the Commission to build the station at Wilson. Mr. Wood is applying a double standard.

Mr. Wood has sent a copy of a letter from the mayor of Turrell in an attempt to show that it's in the public interest. Of course the mayor of Turrell would acknowledge this...Wilson's loss and disappointment is his gain.

On page 4 of Pollack and Mr. Wood's reply (item 1) regarding KOSE being licensed to Osceola, AR the status of this is not consistent in the AM branch. Whatever the case may be it is not the most important and bottom line concern and issue that I am raising.

On page 7 of Pollack and Mr. Wood's reply (item 1) he states that my comments are not submitted in good faith. He comes to this conclusion by erroneously interpreting my letter and himself "assuming". I am new to this type of process with the Commission and after finding out about this late, I was hurried to respond to this proposed rule making. However, I have no problem with the information of my being the licensee of broadcast station KJIW-FM at Helena, Arkansas operating on 94.5. As a matter of fact Mr. Wood actually presents an argument on my behalf and that is if the re-allotment to Turrell may adversely affect my future plans for the Helena station then the question also becomes why should I be deprived of an opportunity to better serve the community and area because of Pollack's abusing the process? Individuals who are serious about upgrading and the hindering of that process. are mentioned in the Commission's reprimand to Pollack

I am also a partner with Burke in an effort to provide better broadcast service to the black community and people in general throughout the Delta since I was born and partly raised there in Helena, Arkansas. I have a primary address in Country Club Hills, Illinois as well as a secondary residence in Helena, Arkansas.

His comments regarding "good faith" is not relevant and still does not change the bottom line. Seven years is seven years. Seven years to build a station when the Commission rule allows only 18 months and now, wanting to be rewarded for dragging this out by moving the allotment closer to Memphis "coming through the back door" would be a disservice. .

There is a document which I read recently put out by the Commission entitled "How To Participate In the FCC Process". This document encourages individuals to participate in the process. It also states, "you do not need an attorney in order to participate in the FCC rule making process or to let your voice be heard at the FCC". I was indeed encouraged by this document that I too as a citizen of the US can participate in matters regarding the air-waves and the administering of the Commission. I have been in broadcasting 30 years; however, I am new to this part of the broadcast entity, and I am relatively new as an owner. I am learning and it is my intention to be more involved in matters regarding the Commission and to help out whenever I can and to offer comments. As a black American I find this exciting and challenging. I want Mr. Woods to know that although I own a station, I still am a citizen and I can participate in the process which the FCC encourages.

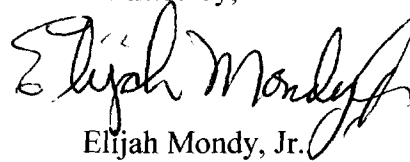
It is therefore very important to me the integrity of the Commission. I see in this attempt to reallocate channel 234A from Wilson to Turrell, if this is allowed, as an undermining of that integrity for all of the reasons I have already submitted to the Commission in previous documents.

I disagree that the public interest is best served by this rule making. The public interest would have been served if Pollack had built the station at Wilson as promised and per FCC rules beginning seven years ago. The Commission's integrity is just as important to the public as well as to me.

Since Pollack does not wish to build the allotted channel 234A at Wilson I am willing to do so if the Commission will assign over to me the construction permit with a small condition which I will discuss later if necessary.

I recommend that Pollack be allowed to do a frequency search at Turrell and go through the normal process of rulemaking and window opening. If all clears they can get a CP to build at Turrell. Since they tied up the Commission's resources and had the Commission and Wilson waiting for seven years, I'm hoping they would be willing to wait a little longer since patience seems to be a virtue they wanted everyone else to practice and they shouldn't mind practicing it too.

Submitted by,



Elijah Mondy, Jr.  
Mondy-Burke Broadcasting  
4200 W. 177th Street  
Country Club Hills, IL 60478

cc Chairman, William Kennard  
cc Mr. John Karousos  
cc Barry D. Wood  
Wood & Brinton, Chartered